
OFFICE OF CONTRACT & GRANT ADMINISTRATION UPDATES

NOVEMBER 14, 2024

RESEARCH ADMINISTRATION FORUM

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UCLA Research
Administration

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F&A GENERAL PRINCIPLES: UC C&G MANUAL

Facilities and administrative (F&A) costs are the indirect costs of conducting research, instruction, or other sponsored activities that cannot be easily attributed to a specific sponsored project. When seeking the reimbursement of indirect costs on a sponsored project, the University is recovering for costs already spent to support these activities.

FULL COST RECOVERY

Full cost recovery is necessary to support the University's physical and administrative capacity to perform research.

UNRECOVERED INDIRECT COSTS

When indirect costs are not fully recovered, maintaining the University's research capabilities and infrastructure is compromised.

COST OF RESEARCH

All sponsored agreements should share the burden of the cost of research.

F&A GENERAL PRINCIPLES: UC C&G MANUAL

FULL COST RECOVERY

Principal Investigators and Administrators have a duty to ensure that sponsored projects are performed on a full cost recovery basis. Principal Investigators and Administrators are obligated to seek full recovery of indirect costs from all sponsors when applying for an extramural award.

DELEGATED AUTHORITY

Only those administrators who have been delegated authority to approve an indirect cost exception may authorize less-than-full indirect cost recovery. Principal Investigators are not delegated this authority. **This means that Principal Investigators are not authorized to negotiate with, or to accept reduced indirect cost rates from, any sponsor.**

UCLA F&A COST RECOVERY



LONG-TERM SUSTAINABILITY

F&A cost recovery is vital to the long-term sustainability of UCLA's research enterprise and its scholarly and creative programs



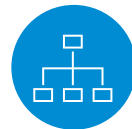
PHYSICAL AND ADMINISTRATIVE INFRASTRUCTURE

F&A funds help to sustain UCLA's physical and administrative infrastructure



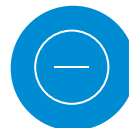
OTHER FUNDING SOURCES

Accepting an award that restricts or prohibits full cost recovery means that the campus must use other funding sources to cover the physical and administrative infrastructure costs associated with the sponsored activity



STEWARDSHIP OF PUBLIC RESOURCES

Because UCLA is a public, state-supported university, it is obligated to conduct and manage its operations and finances in a manner that fosters the responsible stewardship of public resources



LESS THAN FULL F&A RECOVERY

In certain cases, less than full F&A recovery may be considered:

- Sponsor policy
- Campus Determination
- Exceptions must be submitted through OCGA

SPONSOR POLICY

REDUCTION/WAIVER

UCLA will reduce or waive F&A cost recovery if a non-profit sponsor (for example, non-profit foundations, charitable trusts, domestic governmental agencies, and international non-profit organizations) has a policy that limits or prohibits the recovery of F&A costs. However, the sponsor's policy must be:

- Published and consistently applied to all grantees, or
- Conveyed in writing (for example, letter or e-mail) by an official empowered to legally act on the sponsor's behalf and include the official's confirmation that the policy is not applied in an ad hoc or grant-by-grant manner.

FOREIGN GOVERNMENT SPONSOR

When submitting to a foreign governmental sponsor, a foreign governmental sponsor's policy will not be accepted, rather a campus determination must be submitted for the VCR's consideration

UCLA **CAMPUS DETERMINATION CRITERIA**

NO SPONSOR POLICY

Occasionally, in the absence of sponsor policy, the VCR may determine that the development of campus research, training or public service programs or infrastructure may best be served by accepting a sponsored award at less than the indirect cost rate normally paid by the sponsor.

SIGNIFICANT AND VITAL

In such cases, it must be clearly demonstrated that campus interests are sufficiently significant and vital that performing the awarded activity at a loss is more important to UCLA's mission than recovering the full costs of the project.

APPROVAL BEFORE PROPOSAL DEADLINE

For a proposal to be submitted with a reduced F&A rate a campus determination request must be submitted and approved prior to the proposal deadline

CAMPUS DETERMINATION F&A WAIVERS

Campus Determination Letters should

Be addressed to the Vice Chancellor for Research & Creative Activities

Be Signed by the Dean (or Vice Dean for Research)

Include the following information:

- The PI & administrating dept
- Sponsor (& prime sponsor if applicable)
- Project title
- Project period
- Total costs requested
- The sponsors F&A rate and base
- The requested F&A rate and base
- A short summary of the project
- An explanation for why UCLA is best served by accepting the award at less than the indirect cost rate normally paid by the sponsor (see the next slide for guidance)
- The impact to the project and UCLA if a campus determination is not granted

CAMPUS DETERMINATION LETTER

POTENTIAL JUSTIFICATIONS MAY* INCLUDE, BUT ARE NOT LIMITED TO:

- Small seed grants which may attract future larger awards with full F&A
- Awards vital to the campus mission (for example for community relations interests)
- Other types of funding for an established campus program such as for library holdings, performances, or exhibits
- Cases of hardship for a new investigator

**Approval is not guaranteed*

Do not use a check box. A full explanation must be provided.

UNACCEPTABLE JUSTIFICATIONS

- The PI does not want to include F&A
- The sponsor is putting pressure on the PI to not include full F&A
- The PI already submitted the proposal without including the full F&A rate
- The PI is working from home
- The PI is not using all of UCLA facilities therefore they should not have to include F&A (the size of space and usage of administrative services do not determine the appropriate F&A rate)
- F&A was waived on a smaller award so it should be waived now that we have a larger award from the same sponsor

UCLA **CAMPUS DETERMINATION** PROCESS

THE SIGNED LETTER SHOULD BE SUBMITTED TO OCGA FOR REVIEW

OCGA reviews then submits to the AVC for Research Administration; the AVC then makes a recommendation to the VCR.
Recommend submitting request letters well in advance of the proposal deadline

INTERNAL DEPARTMENT OR SCHOOL FORMS

Do not submit or attach any internal department or school forms or documentation with the letter

FEDERAL & STATE SPONSORS

If the funding is Federal or State the request will also need to be submitted (by OCGA) to UCOP for approval

Applicability and Duration of Approved Exceptions (C&G Manual)

Campus Determinations apply to the period of performance of the underlying award, provided there is no material change in the project that affects the basis on which the exception was approved.

A new exception must be requested for each competitive period of the project. Since an exception addresses the amount of funding the campus is willing to forego in indirect cost recovery at the time of the submission, a new assessment of that campus' position on the basis of additional funding in the new application must be considered

NEW EPASS QUESTION: COMMUNITY ENGAGEMENT

Does your proposed research and / or creative activity intentionally engage a community organization / partner for mutual benefit in your work? Yes / No

- Considerations:
 - UCLA has a “public mandate.” As such the University needs to demonstrate and catalog its contributions to the community and how we integrate with the City.
 - For example, demonstrating that the new building downtown includes educational and outreach programs there that will support residents and extend city/local service programs.
 - UCLA’s Strategic Plan #1 goal is to “Deepen our engagement with Los Angeles”
 - “The City of Los Angeles and UCLA have a symbiotic relationship. Los Angeles is a wonderfully diverse and dynamic city, and UCLA contributes to that dynamism by partnering with the city’s communities, supporting its economies, enriching its arts scene and much more. Our ties to this global city are what make our university unique as a public research university. We can better weave UCLA into the fabric of Los Angeles if we work alongside communities to address local challenges like health disparities, sustainability and economic inequality. This will help us more fully meet our public mandate – and will provide learning, research and community engagement opportunities for Bruins. It is a mutually beneficial endeavor, and one that will drive positive change and create a better future for all Angelenos.”
 - Does the project specifically seek to work with a community organization(s) (as opposed to a business, the federal government, or doing it ourselves) because it is important that there are local participants, and/or because they are best qualified to do the work, and/or because they know the people, the neighborhood, the culture, AND because we share interest in their mission and want to support their success in supporting the community.

FALL 2024 NSF VIRTUAL GRANTS CONFERENCE

Save the date for the Fall 2024 NSF Virtual Grants Conference on December 9 – 12.
Registration will open on Wednesday, November 13, at 12 PM ET.

GET NOTIFIED

Why You Should Attend

The NSF Grants Conference is a must-attend for new faculty, researchers, and administrators.

Attendees will:

- Learn about new NSF programs and initiatives
- Understand how to write a successful proposal
- Learn about NSF's Merit Review Process and conflict of interest policies
- Participate in NSF directorate sessions
- Understand award management policies and procedures

[NSF Policy Office Outreach](#)



Upcoming OCGA Monthly Training

Post-Submission Requirements

November 20, 2024

“Common post-submission/pre-award requirements, such as NIH Just-in-Time (JIT) requests, Current and Pending (Other) Support and other NSF and DOD pre-award requests.”

[Register for OCGA Monthly Training](#)

Separate registration for each session is required

2025 OCGA MONTHLY TRAINING

January	Preparing and Submitting a Proposal for OCGA Review
February	S2S Grants Basics
March	Preparing an NIH Multiproject Application in NIH ASSIST
April	Budgets 101
May	Completing the EPASS
June	NSF Research.gov Basics
July	Post-Submission/Pre-Award Requirements
August	Award Processing
September	S2S Grants Basics
October	Requesting New and Amendment Subawards
November	Completing the EPASS

[Details and Registration](#)

Separate registration for each session is required

OCGA WINTER CLOSURE TIMELINES

- In observance of the [UCLA Winter Holiday Closure](#), the Office of Contract and Grant Administration will close at 5:00 PM on Friday, December 20, 2024, and will reopen at 8:00 AM on Thursday, January 2, 2025.
- Please note that in the weeks immediately prior to curtailment, OCGA usually has an increased volume of proposal submissions and other transaction requests. We will review proposals and transactions in order of date received. Please be advised of the following deadlines to ensure review prior to the winter closure:
 - Proposals with submission deadlines between Friday, December 20th, 2024 and Thursday, January 2nd, 2025 must be submitted to OCGA by **Friday, December 13, 2024** to ensure submission.
 - All other transactions should be submitted by **Monday, December 16, 2024** to allow for review prior to winter closure.